Federal Defenders OF NEW YORK, INC.

February 19, 2020

Southern District 52 Duane Street-10th Floor, New York, NY 10007 : (212) 417-8200 Fix (212) 571-039

By ECF

David E. Patton Executive Director

Honorable George B. Daniels United States District Judge Southern District of New York 500 Pearl Street New York, New York 10007

FEB 2 0 2020

The sentencing is adjourned from March 10, 2020 to June 16, 2020

at 10:00 a.m.

Re:

United States v. Sandy Susoho, 19 Cr. 754 (GBD)

Dear Judge Daniels:

I write on consent (Assistant U.S. Attorney Jun Xiang and Probation Officer Emily Frankelis) to respectfully request that the Court adjourn sentencing in this matter, which is currently scheduled for March 10, 2020, at 10:00 a.m., until the week of June 8, 2020, or a date thereafter that is convenient for the Court. I further request that the Court set the following disclosure dates for the Presentence Report: April 27, 2020 for the first report; and May 26, 2020 for the final report.

Sandy Susoho pleaded guilty on November 5, 2019 to a conspiracy to misuse a passport, in violation of 18 U.S.C. § 371. After Ms. Susoho's plea, we applied to the Young Adult Opportunity Program, and the Court agreed to stay the presentence interview while the application was pending. The government has determined, though that – even if Ms. Susoho does well in the YAO Program – it cannot change its charging decision because the case was transferred to the Southern District pursuant to Rule 20 of the Federal Rules of Criminal Procedure. Accordingly, we have withdrawn our YAO Program application, and respectfully ask the Court to reschedule sentencing with sufficient time for the Probation Office to prepare a Presentence Report.

Respectfully submitted,

Martin S. Cohen

Ass't Federal Defender Tel.: (212) 417-8737

Jun Xiang, by ECF cc:

Emily Frankelis, U.S. Probation Officer, by e-mail